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| kdunn@bsfllp.com HAMISH P.M. HUME (Pro Hac Vice) hhume@bsfllp.com BOIES SCHILLER FLEXNER LLP 1401 New York Avenue, N.W. Washington DC 20005 Tel: 202.237.2727 / Fax: 202.237.6131 WILLIAM CARMODY (Pro Hac Vice) bearmody@susmangodfrey.com SHAWN RABIN (Pro Hac Vice) srabin@susmangodfrey.com SUSMAN GODFREY LLP 1301 Avenue of the Americas, 32nd Floor New York, NY 10019-6023 Tel: 212.336.8330 / Fax: 212.336.8340 Attorneys for Defendants UBER TECHNOLOGIES, INC. and OTTOMOTTO LLC UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA SAN FRANCISCO DIVISION WAYMO LLC, Plaintiff, V. UBER TECHNOLOGIES, INC., OTTOMOTTO LLC; OTTO TRUCKING LLC, Defendants. Defendants. Defendants Defendants Defendants Defendants TECHNOLOGIES, INC. AND OTTOMOTTO LLC; OTTO TRUCKING LLC, FILE UNDER SEAL EXHIBITS ATTACHED TO THEER NOTICE OF FILING OF PHOTOGRAPHS | 5 | | |
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| 12 SUSMĀN GODFREY LLP 1301 Avenue of the Americas, 32nd Floor New York, NY 10019-6023 Tel: 212.336.8330 / Fax: 212.336.8340 14 Attorneys for Defendants UBER TECHNOLOGIES, INC. and OTTOMOTTO LLC 16 UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA SAN FRANCISCO DIVISION 20 WAYMO LLC, Case No. 3:17-cv-00939-WHA 21 Plaintiff, DEFENDANTS UBER TECHNOLOGIES, INC. AND OTTOMOTTO LLC'S ADMINISTRATIVE MOTION TO FILE UNDER SEAL EXHIBITS ATTACHED TO THEIR NOTICE OF FILING OF PHOTOGRAPHS | 11 | SHAWN RABIN (<i>Pro Hac Vice</i>) | |
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| UBER TECHNOLOGIES, INC. and OTTOMOTTO LLC UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA SAN FRANCISCO DIVISION WAYMO LLC, Plaintiff, V. UBER TECHNOLOGIES, INC., OTTOMOTTO LLC; OTTO TRUCKING LLC, Defendants. Case No. 3:17-cv-00939-WHA DEFENDANTS UBER TECHNOLOGIES, INC. AND OTTOMOTTO LLC'S ADMINISTRATIVE MOTION TO FILE UNDER SEAL EXHIBITS ATTACHED TO THEIR NOTICE OF FILING OF PHOTOGRAPHS | 14 | | |
| 17 UNITED STATES DISTRICT COURT 18 NORTHERN DISTRICT OF CALIFORNIA 19 SAN FRANCISCO DIVISION 20 WAYMO LLC, 21 Plaintiff, 22 v. 23 UBER TECHNOLOGIES, INC., OTTOMOTTO LLC; OTTO TRUCKING LLC, 24 Defendants. Case No. 3:17-cv-00939-WHA DEFENDANTS UBER TECHNOLOGIES, INC. AND OTTOMOTTO LLC'S ADMINISTRATIVE MOTION TO FILLE UNDER SEAL EXHIBITS ATTACHED TO THEIR NOTICE OF FILING OF PHOTOGRAPHS | 15 | UBER TECHNOLOGIES, INC. | |
| NORTHERN DISTRICT OF CALIFORNIA SAN FRANCISCO DIVISION WAYMO LLC, Plaintiff, v. UBER TECHNOLOGIES, INC., OTTOMOTTO LLC; OTTO TRUCKING LLC, Defendants. DEFENDANTS UBER TECHNOLOGIES, INC. AND OTTOMOTTO LLC'S ADMINISTRATIVE MOTION TO FILE UNDER SEAL EXHIBITS ATTACHED TO THEIR NOTICE OF FILING OF PHOTOGRAPHS | | | CTRICT COLIDT |
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| WAYMO LLC, Plaintiff, V. UBER TECHNOLOGIES, INC., OTTOMOTTO LLC; OTTO TRUCKING LLC, Defendants. Case No. 3:17-cv-00939-WHA DEFENDANTS UBER TECHNOLOGIES, INC. AND OTTOMOTTO LLC'S ADMINISTRATIVE MOTION TO FILE UNDER SEAL EXHIBITS ATTACHED TO THEIR NOTICE OF FILING OF PHOTOGRAPHS | 18 | NORTHERN DISTRICT | OF CALIFORNIA |
| Plaintiff, V. UBER TECHNOLOGIES, INC., OTTOMOTTO LLC; OTTO TRUCKING LLC, Defendants. DEFENDANTS UBER TECHNOLOGIES, INC. AND OTTOMOTTO LLC'S ADMINISTRATIVE MOTION TO FILE UNDER SEAL EXHIBITS ATTACHED TO THEIR NOTICE OF FILING OF PHOTOGRAPHS | 19 | SAN FRANCISC | O DIVISION |
| 22 v. 23 UBER TECHNOLOGIES, INC., COTTOMOTTO LLC; OTTO TRUCKING LLC, 24 Defendants. TECHNOLOGIES, INC. AND OTTOMOTTO LLC'S ADMINISTRATIVE MOTION TO FILE UNDER SEAL EXHIBITS ATTACHED TO THEIR NOTICE OF FILING OF PHOTOGRAPHS | 20 | WAYMO LLC, | Case No. 3:17-cv-00939-WHA |
| 22 v. 23 UBER TECHNOLOGIES, INC., OTTOMOTTO LLC'S ADMINISTRATIVE MOTION TO FILE UNDER SEAL EXHIBITS ATTACHED TO THEIR NOTICE OF FILING OF PHOTOGRAPHS 26 27 | 21 | Plaintiff, | TECHNOLOGIES, INC. AND |
| UBER TECHNOLOGIES, INC., OTTOMOTTO LLC; OTTO TRUCKING LLC, Defendants. FILE UNDER SEAL EXHIBITS ATTACHED TO THEIR NOTICE OF FILING OF PHOTOGRAPHS FILOMOTOGRAPHS | 22 | V. | |
| Defendants. 26 27 | 23 | UBER TECHNOLOGIES, INC., OTTOMOTTO LLC; OTTO TRUCKING LLC, | FILE UNDER SEAL EXHIBITS ATTACHED TO THEIR NOTICE OF |
| 26 27 | 24 | Defendants. | FILING OF PHOTOGRAPHS |
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Pursuant to Civil Local Rules 7-11 and 79-5, Defendants Uber Technologies, Inc. and Ottomotto LLC ("Defendants") submit this motion for an order to file under seal exhibits attached to their Notice of Filing of Photographs. Specifically, Defendants request an order granting leave to file under seal the following confidential documents:

| Document | Portions to Be Filed Under Seal | Designating Party |
|--------------|---------------------------------|--------------------------|
| Exhibits A-B | Entire Documents | Defendants |

Exhibits A-B are photographs containing highly confidential information regarding the technical details of Uber's LiDAR systems. This highly confidential information is not publicly known, and its confidentiality is strictly maintained. Disclosure of this information could allow competitors to obtain a competitive advantage over Uber by giving them details into the technical components of Uber's LiDAR sensors, such that Uber's competitive standing could be significantly harmed. (Declaration of Thomas Pardini in Support of Defendants' Administrative Motion to File Documents Under Seal ("Pardini Decl.") ¶ 3.)

Pursuant to Civil Local Rule 79-5(d)(2), Defendants will lodge with the Clerk the documents at issue, with accompanying chamber copies.

Defendants served Waymo with this Administrative Motion to File Documents Under Seal on October 25, 2017.

For the foregoing reasons, Defendants request that the Court enter the accompanying Proposed Order granting Defendants' Administrative Motion to File Documents Under Seal and designate the service copies of these documents as "HIGHLY CONFIDENTIAL – ATTORNEYS' EYES ONLY."

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| Dated: October 25, 2017 MORRISON & FOERSTER LLP By: /s/Esther Kim Chang ESTHER KIM CHANG Attorneys for Defendants UBER TECHNOLOGIES, INC. and OTTOMOTTO LLC OTTOMOTTO LLC 10 11 12 13 14 15 16 17 18 19 20 21 |
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| By: /s/Esther Kim Chang ESTHER KIM CHANG Attorneys for Defendants UBER TECHNOLOGIES, INC. and OTTOMOTTO LLC 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 |
| Attorneys for Defendants UBER TECHNOLOGIES, INC. and OTTOMOTTO LLC 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 |
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